

DECLARATION OF LAURA BELOUS

I, Laura Belous, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a practicing attorney licensed to practice before the States of Arizona. My business address is PO Box 86299 Tucson, AZ 85754. I have been employed as an attorney at the Florence Immigrant & Refugee Rights Project (FIRRP) between 2010 and 2012 and since 2013. I am over the age of 18 and am competent to testify regarding the matters described below.
2. FIRRP is a non-profit 501(c)(3) organization that provides free legal and social services to the thousands of adults and children detained in immigration custody in Arizona on any given day. The Florence Project was founded in 1989 to provide free legal services to asylum seekers and other migrants in a remote immigration detention center in Florence, Arizona where people had no meaningful access to counsel. The Florence Project has expanded significantly since that time and now provides free legal and social services, including legal orientation program services, to thousands of detained adults. We also provide legal and social services to unaccompanied children throughout Arizona. As the only 501(c)(3) non-profit organization in Arizona dedicated to providing free legal and social services to people in immigration detention, our vision is to ensure that every person facing removal proceedings has access to counsel, understands their rights under the law, and is treated fairly and humanely.
3. I previously submitted a declaration in this case summarizing my past work experience, including with persons who were removed to a third country without notice or opportunity to claim fear. I write to supplement that declaration.
4. On April 8, I became aware of a former Florence Project client, a Venezuelan national, who was detained by ICE and removed to Mexico shortly thereafter. He believes this happened on March 29, 2025. I have reviewed the messages that the client sent to the attorney at the Florence Project who represented him in removal proceedings.
5. The Florence Project represented the client in removal proceeding and he ultimately won deferral of removal under the Convention Against Torture in September 2024. There was no alternate country of removal designated on the IJ order. The client was released from detention in late September 2024 and the Florence Project ended representation because removal proceedings concluded.
6. A few days ago, the client texted the legal assistant previously assigned to that case that, without any notice, ICE deported him to Mexico. To our knowledge, he was not arrested or had any issues with law enforcement since he received deferral of removal under the Convention Against Torture of last fall.

7. The former client stated that on what he believes was March 29, 2025, ICE officers arrested him outside of his apartment in Mesa, AZ at about 7:30 am. He reports that they took his phone and refused to allow him to call anyone. He also reports that ICE also confiscated his Venezuelan passport and refused to return it.
8. The former client reports that ICE initially told him that he was going to El Salvador, but the next day at around 8:00 am, ICE brought him to Nogales, Sonora, Mexico. He was transferred to the custody of Mexican authorities who transported him to Hermosillo and Mexico City. From there, he spent approximately 72 hours on a bus to Tabasco. He was briefly held in an immigration detention center in Tabasco and then released.
9. The former client reports that he received no meaningful notice of the planned removal to Mexico. He does not know why he was sent there. He says that tried to explain to ICE that he was just a student from Venezuela but they did not allow him to explain or voice a fear claim to Mexico.
10. The former client reports that he is deeply afraid of living in Mexico without any legal status. He is worried about being subject to arbitrary arrest and kidnapping by criminal groups targeting and extorting migrants. He also fears that Mexican authorities will deport him to Venezuela.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed this 9th day of April 2025 at Tucson, Arizona.



Laura Belous